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NEW YORK CALIFORNIA GEORGIA PENNSYLVANIA

March 15, 2022

VIA ECF

The Honorable P. Kevin Castel United States District Judge Daniel Patrick Moynihan US Courthouse 500 Pearl Street New York, NY 10007-1312

Re: In re Hudson's Bay Company Data Security Incident Consumer Litigation, No. 1:18-cv-08472 (PKC)

Dear Judge Castel,

My firm is Interim Co-Lead Counsel for Plaintiffs and the Class in this Action and I write on behalf of all Parties. On March 1, 2022, the Parties attended the continued Final Approval Hearing. During the Hearing, the Parties informed the Court that claims that were initially deemed to be deficient were still in the process of being potentially remedied and processed by the Claims Administrator. The Court asked how long that process was expected to take. The Claims Administrator estimated two weeks. The Court therefore directed the parties to advise the Court when the process is complete. We are writing today to provide an update on that process.

Immediately following the March 1, 2022 Final Approval Hearing, the Parties have been working closely with the Claims Administrator to finalize the processing of the remaining, potentially valid claims. As of the date of this letter, the Claims Administrator is continuing to work on finalizing and processing these claims and expects this process to be finalized by March 22, 2022. Thus, the Parties respectfully request that the Court allow the Parties and Claims Administrator to provide a finalized accounting of these claims by March 24, 2022. We thank the Court in advance for consideration of this request.

Respectfully submitted,

/s/Timothy J. Peter
Timothy J. Peter
Interim Co-Lead Counsel for Plaintiffs and the
Class

/s/Gregory T. Parks
Gregory T. Parks
Counsel for Defendants